



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

REDACTED VERSION

November 5, 2004

INFORMATION REQUEST
CERTIFIED MAIL: RETURN RECEIPT REQUESTED

Certified Mail Receipt number:

Re: Request for information concerning Rollins Environmental Services (LA), Inc. and Devil's Swamp Lake

Dear

The U.S. Environmental Protection Agency (EPA) is investigating contamination in Devil's Swamp Lake. Information provided by Clean Harbors, Inc., current owner of the Rollins Environmental Services (LA), Inc. (Rollins) facility, indicates you were an employee of Rollins in the early years of operation.

The EPA seeks your cooperation in providing information concerning the operations of Rollins, or any other entity associated with the facility. Your response is needed to help EPA develop a better understanding of the operations of the facility.

We have enclosed a questionnaire which we would like you to complete and return to EPA within 20 days. To assist you, we have included a pre-addressed stamped envelope. This information is very important to assist EPA in its efforts to protect human health and the environment. For your information, we have also enclosed a fact sheet with more details about the Devil's Swamp Lake Superfund Site, which is adjacent to the Rollins/Clean Harbors facility.

If you have any questions pertaining to the history of the site, the nature of the environmental conditions at the site, or the status of response activities, please contact Mr. Bartolome J. Cañellas, the Remedial Project Manager, at (800) 533-3508, or (214) 665-6662. For legal inquiries, please contact Mr. James Bove, Assistant Regional Counsel, at (214) 665-2794. For general questions about this letter, you may contact me at (214) 665-2712.

Internet Address (URL) • <http://www.epa.gov>

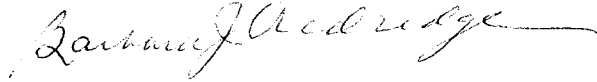
Recycled/Recyclable • Printed with Vegetable Oil Based Inks on Recycled Paper (Minimum 25% Postconsumer)



9421497

Thank you for your cooperation. We appreciate your assistance.

Sincerely yours,

A handwritten signature in cursive script, reading "Barbara J. Aldridge", followed by a horizontal flourish line.

Barbara J. Aldridge
Enforcement Officer

Enclosures (3)

Enclosure A - Questionnaire

QUESTIONS TO: FIELD(1)

1. **Please give your full name and current address.**

2. **Are you an employee or former employee of the Rollins facility?**

☐ Yes. If yes, please state the years worked at Rollins and then proceed to the next question.

☐ No. If no, please return this questionnaire to the EPA in the enclosed envelope.

3. **Do you recall the facility handling any drums, waste stream or disposal articles such as electric capacitors or transformers with a material known as Polychlorinated Biphenyls or PCBs which subsequently were disposed of in the disposal pits or cells? (PCBs also known as aroclors)**

☐ Yes. If yes, please describe your recollection of the event(s), the approximate years the event(s) took place, and proceed to the next question.

☐ No. If no, please proceed to next question.

4. **Do you recall having observed the disposal of pieces of electronic equipment known as capacitors or transformers into the disposal pits or cells?**

☐ Yes. If yes, please describe your recollection of the event, the approximate years the practice took place and proceed to the next question.

☐ No. If no, please proceed to next question.

5. **Do you recall the operation of disposal pits or disposal cells at the Rollins facility?**

☐ Yes. If yes, please describe your recollection of the cells and proceed to the next question.

☐ No. If no, please proceed to next question.

6. **Did you observe any of the disposal pits, or disposal cells full of liquids, bleeding, spilling and/or running over the ground onto adjoining properties or into the drainage canal that runs through the facility and discharges into the swamp and Devil's Swamp Lake?**

☐ Yes. If yes, please describe your recollection of the event(s), the approximate years the practice took place, and then proceed to the next question.

☐ No. If no, please proceed to next question.

7. **Is there anything else you can add?**

☐ Yes. If yes, please add any additional information you want to bring to our attention and return the questionnaire to the EPA in the enclosed envelope. Use extra sheets of paper if needed.

☐ No. If no, please return this questionnaire to the EPA in the enclosed envelope.

DEVIL'S SWAMP LAKE

Baton Rouge, Louisiana

EPA ID#: LAD981155872

Site ID: 0600652

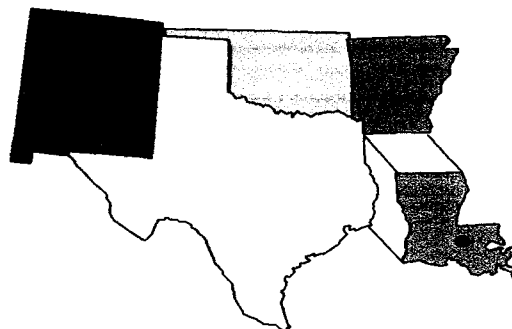
EPA Region 6

State Congressional District: 06

East Baton Rouge Parish

Updated: October 2004

Next Update: November 2004



Current Status

The site was proposed to the NPL list in the *Federal Register* on March 8, 2004. The EPA established a public comment period and will make a final listing decision after considering the relevant comments if the site continues to meet the requirements for listing.

Site Description

Devil's Swamp Lake is characterized as a man-made lake, resulting from the construction of Baton Rouge harbor in 1973.

Site Responsibility: Environmental Protection Agency, Region 6.

NPL Listing History: Proposed Date: 3/8/2004

Final Date: Pending

Cleanup Progress

The identification of the site for the NPL is intended to guide the EPA in:

determining which sites warrant further investigation to assess the nature and extent of the human health and environmental risks associated with a site.

Site Contacts

Remedial Project Manager
Bartolome J. Canellas
(214) 665-6662

Community Involvement Coordinator
Janetta Coats
1-888-533-3508

Expanded Site Description

- Location:**
- Devil's Swamp consists of a large flood plain area near Scotlandville, East Baton Rouge Parish, Louisiana, about ten miles north of the City of Baton Rouge.
 - Devil's Swamp is also a freshwater wetland covering approximately 31 square kilometers (12 square miles) of land along the Mississippi River.
 - Bayou Baton Rouge is part of the swamp drainage system, it extends from the northern portion of the site and meanders approximately 12 kilometers south to the discharge in the Mississippi River.
 - Within the swamp, the "Oxbow" or "U" shaped Devil's Swamp Lake is approximately 0.75 miles (4,200 feet) in length, 1/12 miles (400 feet) wide, some 20 feet deep at its deepest parts, and covers approximately 64 acres.
 - Devil's Swamp Lake is characterized as a man-made lake, resulting from the construction of Baton Rouge harbor in 1973.
 - Devil's Swamp Lake is adjacent to the National Pollutant Discharge Elimination System (NPDES) permitted outfall of the Clean Harbors Environmental Services, Inc. facility (formerly Rollins Environmental Services of Louisiana, Inc.). PCBs have been documented in the lake and the outfall canal.
 - The coordinates for this site are North Latitude 30° 33 '43" and West Longitude -91° 13' 14".
- Population:**
- City of Baton Rouge (population 602,894 in 2002)(Metro statistical area).
 - Parish of East Baton Rouge (population 412,952 in 2000)(U.S. Census Bureau).
 - The community is predominantly rural with a few houses located about 800 to 1000 feet from the Bayou Baton Rouge, near the northern portion of the swamp and the crossing of Bayou Baton Rouge under Scenic Highway.
 - Prior to 1950's, the area consisted of scattered agricultural farms, pasture land and some timber. Rapid industrialization throughout the 1960's and 1970's resulted in numerous industrial facilities in areas surrounding Devil's Swamp.
 - Major residential areas include Scotlandville, and residential communities along Highway 61, Scenic Highway, east of Devil's Swamp. This includes the Alsen Community.
- Setting:**
- Industrial facilities have discharged to the swamp since the 1960's and the 1970's.
 - The swamp to the north of the lake is characterized by numerous small open ponds and water tupelo trees. This 262-acre area extends approximately 1.0 miles (5,500 feet) to the Devil's Swamp Lake.
 - The swamp to the south of the lake is characterized also by numerous small open ponds and water tupelo trees. This 684-acre area extends approximately 2.2 miles (11,500 feet) to the Mississippi River and is subject to frequent backwater encroachment from the river.
- Hydrology:**
- Devil's Swamp Lake, Bayou Baton Rouge and Devil's Swamp are within the Mississippi River flood plain. The Mississippi flood plain is a fresh water Wetlands.

Expanded Present Status and Issues

- The site was proposed to the NPL list in the *Federal Register* on March 8, 2004.
- The EPA established a public comment period and considers all comments received during a 60-day period following the publication date in the Federal Register. The EPA will make a final listing decision after considering the relevant comments if the site continues to meet the requirements for listing.
- This comment period started on March 8, 2004 and closed on May 7, 2004. To review comments submitted, they can be view using the Internet at EDOCKETS, the address is <http://www.epa.gov/edocket> under docket SFUND-2004-0004.
- For other information, the public may contact the Docket Coordinator by mail at:

Attention Docket ID No. SFUND-2004-0004

Docket Coordinator, Headquarters
U.S. Environmental Protection Agency
CERCLA Docket Office
Mail Code 5305T
1200 Pennsylvania Avenue NW.
Washington, DC 20460

- In the meantime, the EPA and the Louisiana Department of Environmental Quality (LDEQ) are preparing a response to comments and continue enforcement activities to identify Potentially Responsible Parties (PRPs) before commencing a Remedial Investigation/Feasibility Study (RI/FS) at this site.

Wastes and Volumes

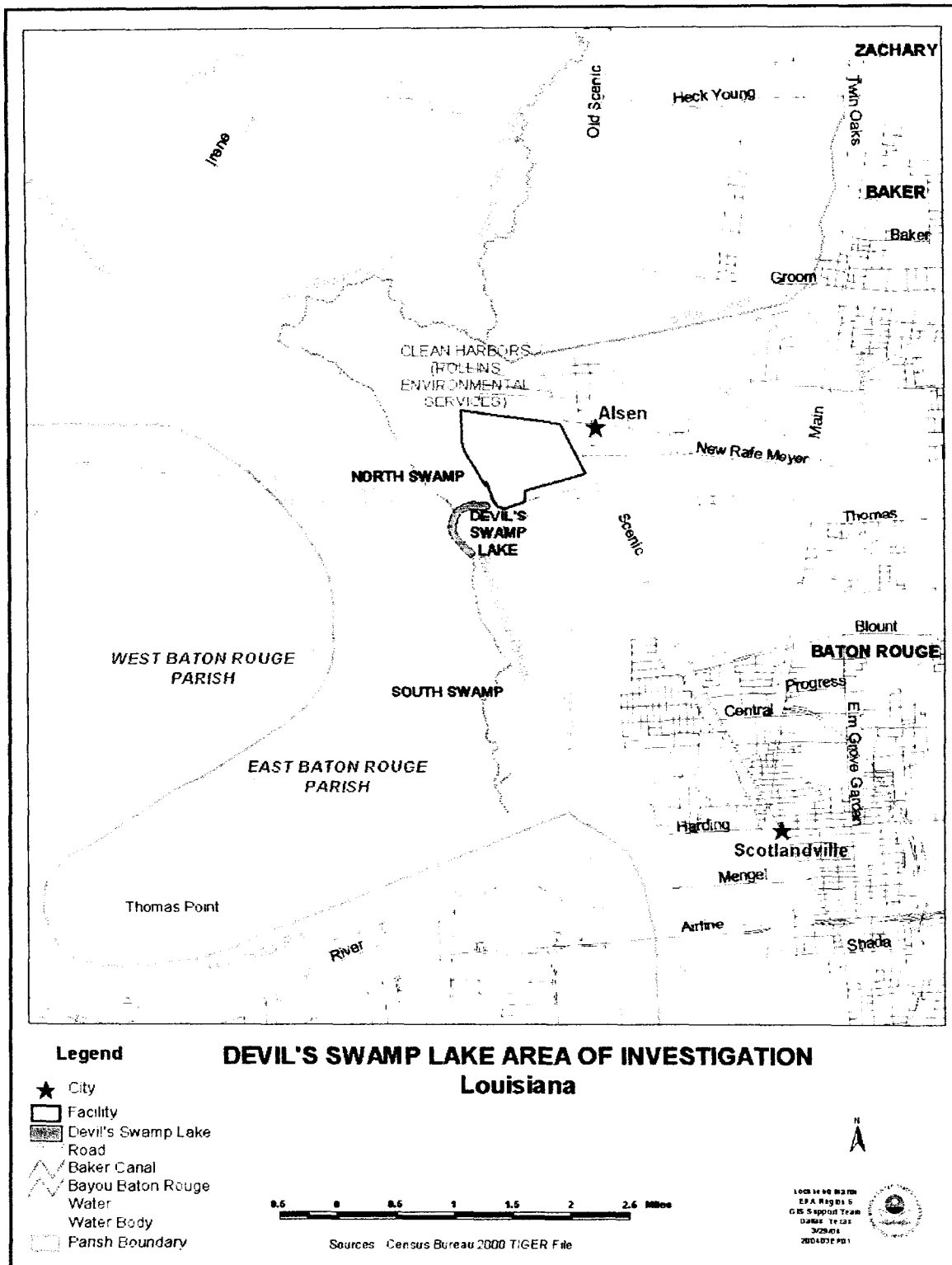
- Sampling conducted by the State in 1980's identified the presence of Polychlorinated biphenyls (PCBs) in the lake and in a drainage ditch or outfall canal leading to the former Rollins facility. PCBs are a category or family of chemical compounds.
- Concentrations of PCBs have been observed in several samples collected by the EPA during a 1993 Expanded Site Inspection. Some samples show concentrations of PCBs congeners of up to 5.2 mg/kg of Aroclor-1248, 6.4 mg/kg of Aroclor-1254 and 1.6 mg/kg of Aroclor-1260. Congeners are well-defined chemical compounds in the PCB category.
- The extent of contamination and volume of contamination have not been established

National Priorities List

NPL Inclusion Proposal Date:		March 8, 2004.
NPL Inclusion Final Date:	n/a	
NPL Deletion Proposal Date:		n/a
NPL Deletion Final Date:	n/a	

Site Map

See next page.



Expanded Site History

- Rapid industrialization throughout the 1960's and 1970's resulted in numerous waste storage pits and releases of hazardous substances in areas surrounding the Devil's Swamp.
- Devil's Swamp Lake is a man-made lake situated between the northern and southern regions of Devil's Swamp.
- The lake was created in 1973 from the dredging of sediments that were used as embankment fill for reinforcing the levee along Baton Rouge Harbor. Baton Rouge Harbor is located just south of Devil's Swamp Lake along the east side of Devil's Swamp. Devil's Swamp Lake is oxbow-shaped having a width of approximately 122 m (400 ft) and a length of about 1,280 m (4,200 ft). The dredged out area of the lake covers approximately 15.8 hectares (39 acres), however the overall lake area is about 26 hectares (64 acres) as a result of natural ponds that connect directly to the dredged area.
- During flood conditions, the western and northern boundaries of the lake are indistinct as it coalesces with water of the surrounding swamp. A centerline depth ranging from approximately 3.0 to 7.6 m (10 to 25 ft) has been measured in the lake during low water conditions. However the lake stage, and thus the lake depth, varies considerably from the high-water season in the spring to the low water season in the fall. The lake stage was observed to fluctuate 3.0 to 4.6 m (10 to 15 ft) between high and low water sampling events.
- Mississippi River hydrographs by the United States Army Corps of Engineers (USACE) shows a yearly average stage variations of up to 20 feet near Baton Rouge.
- Clean Harbors Environmental Services, Inc. (Clean Harbors), formerly Rollins Environmental Services of Louisiana, Inc. (Rollins), is located north of the Baton Rouge Barge Harbor and west of Scenic Highway. Rollins began operating a hazardous chemical disposal facility here in 1971. Most of the landfill cells and receiving basins were below grade and used the natural clay soils for liners. In 1980, Rollins initiated improvements to the facility which included excavation of previous disposal units, the construction of new landfills with liners (clay and synthetic), and implementation of a groundwater monitoring and recovery program.
- Sediment sampling conducted by the LDEQ (1986) and the EPA confirmed the presence of PCBs in Devil's Swamp Lake and along the effluent wastewater drainage ditch or outfall from the former Rollins facility.
- The Clean Harbors facility have a National Pollutant Discharge Elimination System (NPDES) permit allowing treated wastewater and storm water to be discharged since April 20, 1970. The facility outfall historically discharged to the north end of Devil's Swamp Lake before the present discharge line of the treated wastewater to the Mississippi River was installed an permitted on June 2, 1993.
- Currently, Clean Harbors is also permitted under the Resource Conservation and Recovery Act (RCRA) and the Hazardous and Solid Waste Amendments (HSWA).
- The Louisiana Department of Health and Hospitals, in conjunction with the LDEQ, issued an advisory to limit fish consumption to two meals per month and avoid swimming in Devil's Swamp Lake, Devil's Swamp and Bayou Baton Rouge.
- In October 2004, the United States Geological Survey (USGS), in coordination with the EPA and the LDEQ, plan to investigate the occurrence and historical trends of contaminant compounds and chemical elements through the examination of sediments deposited in the lake.

Enforcement History

- General Notice Letter and 104(e) information request letter was sent to identified PRPs in December 2003.
- Additional General Notice Letter and 104(e) information request letter was sent to identified additional PRPs in 2004.

Human Health and Ecological Risk Assessment

- Several Preliminary Assessments and Site Inspections were completed by the EPA. More recently, in 1995, the EPA completed a Screening Level Risk Assessment (SLRA). This screening report indicated a potential for adverse risk.

- Based on the limited information available in 1995, it appears that contaminants could be posing adverse effects to biota utilizing the site, thus, the EPA initiated a comprehensive risk assessment to further collect more information, evaluate the site and the potential risk.
- In 1997, the EPA conducted sampling activities during high and low flow conditions. Data collected was analyzed and validated in 1998.
- A Human Health Risk Assessment and an Ecological Risk Assessment were completed in early 1999 by the EPA.
- The Human Health and Ecological Risk Assessments have shown that concentrations of PCBs can produce unacceptable risks to human health and the environment.

Record of Decision

- Signed: No record of decision yet.

Community Involvement

- Community Involvement Plan: Being developed
- Open houses and workshops: As needed or requested
- Proposed Plan Fact Sheet: As needed
- Proposed Plan Public Meeting: As needed
- ROD Fact Sheet: Not Yet Issued.
- Milestone Fact Sheets: Not Yet Issued.
- Citizens on site mailing list: On going development
- Site Repository:

Scotlandville Branch Library
7373 Scenic Hwy.
Baton Rouge, LA 70808
225-354-7500

Louisiana Department of Environmental Quality
(Reference: Agency Interest #86800)
602 North 5th St.
Baton Rouge, LA 70802
225-219-3172

U.S. Environmental Protection Agency
12th Floor, Suite 1200, 12D13
1445 Ross Ave
Dallas, TX 75202
1-800-533-3508

Technical Assistance Grant

- Availability Notice: 1st newspaper notice 3/17/2004 in the Baton Rouge Advocate newspaper; fact sheet 3/17/04; 2nd newspaper notice 5/1/04.
- Letters of Intent (LOI) received:
 - 1) 4/27/04 - North Baton Rouge Environmental Association
 - 2) 5/10/04 - North Baton Rouge Chamber of Commerce
 - 3) 5/24/04 - Alsen Environmental Justice Community Organization (AEJCO)
- On 6/21/04, AEJCO requested an application deadline extension. Deadline was extended to 7/21/04 and on 6/24/04, all potential applicants were notified of the application deadline extension.

Applicants were also asked to contact site RPM to secure copy of draft schedule of anticipated activities for development of TAG application Statement of Work.

- Final Application Received: N/A
- Grant Award: N/A
- Current Status: N/A

Site Contacts

EPA Remedial Project Manager:	Bartolome J. Cañellas	214.665.6662 or 800.533.3508
EPA Site Attorney:	James Bove	214.665.2794 or 800.533.3508
EPA Community Involvement:	Janetta Coats	214.665.7308 or 800.533.3508
EPA Press Officer:	Dave Barry	214.665.2208 or 800.533.3508
EPA Contractor:		
EPA Regional Public Liaison:	Arnold Ondarza	1.800.533.3508
LDEQ Louisiana State Contact:	Thomas Stafford	225.219.3222 or 800.763.5424